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February 27, 2006

***VIA E-MAIL AND U.S. MAIL***

Thomas Krueger  
Associate Regional Counsel  
U.S. Environmental Protection Agency  
77 W. Jackson Blvd. (C-14J)  
Chicago, IL 60604-3590

EPA Region 5 Records Ctr.



265622

Re: Ellsworth Industrial Park  
Settlement Agreement and Order  
Comments on U.S. EPA's Draft "Preliminary Planning Report"

Dear Mr. Krueger:

This letter is submitted on behalf of Lindy Manufacturing Company ("Lindy"), one of the signatories to the Settlement Agreement and Order ("SAO") entered into on or about September 29, 2005, in connection with the Ellsworth Industrial Park Site ("EIP").

Set forth below are Lindy's individual comments on the draft Preliminary Planning Report ("PPR") issued by the Agency on January 20 and 27, 2006 (in parts). These comments are being submitted at the same time, and are to be read together with, the comments of the Ellsworth Group and the comments of the Ellsworth Group's technical consultant Michael Baker Jr., Inc. ("Baker"). Lindy's comments, those of Baker, and those of the Ellsworth Group shall in no event be construed as an admission, in whole or in part, of liability or responsibility for conditions in or about the EIP. Nor shall they be construed as an admission or acknowledgement, in whole or in part, that the draft PPR is necessary or appropriate, that it complies with applicable laws, regulations and Agency guidance, or that it is consistent with the requirements of the SAO or the Agreement in Principle (July 2003).

1. Lindy concurs with the recommendations made by Lovejoy in its letter dated December 7, 2005 regarding additional properties that merit additional investigation (see Lovejoy letter dated 12/7/05, Attachments B-O).

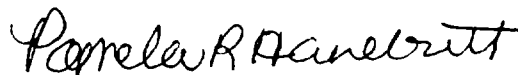
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2. Lindy recommends that EPA conduct sub-slab gas sampling under the building located at 2615 Curtiss Street. EPA's PPR proposes to do some soil gas sampling east and west of the building, but none under the building itself (even though EPA proposes to conduct sub-slab gas sampling at numerous other locations in the EIP). With respect to this property (located southeast of the intersection of Curtiss Street and Katrine Avenue), Weston's Phase II Site Assessment Report dated August 2002 reported that, according to aerial photographic analysis, former waste storage areas are currently located underneath the building. Based on this information, as well as other sampling data indicating that this property may be a source of chlorinated solvents contamination, sub-slab gas samples should be collected.

3. Lindy recommends that EPA conduct further investigation of the old Downers Grove Sanitary District lagoons (located north of the Lindy facility). BD-4(1) shows groundwater detections of 1.2 ppb TCA and 9.2 ppb TCE. Based upon this data and the fact that this area is upgradient of the EIP, soil and groundwater samples should be collected from a variety of depths

We appreciate the opportunity to comment. If you need additional information, please call us.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela R. Hanebutt". The script is cursive and fluid.

Pamela R. Hanebutt

PRH:sms

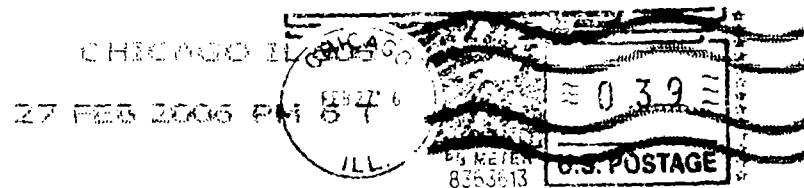
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PROTECTION AGENCY

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